



May 13, 2020

The Honorable Susan Eggman
California State Assembly
State Capitol, Room 4117
Sacramento, CA 95814

**Re: AB 2580 (Eggman) Conversion of motels and hotels: streamlining
As amended May 11, 2020 – SUPPORT IN CONCEPT
Set for hearing in Assembly Housing and Community Development May 20, 2020**

Dear Assembly Member Eggman,

The California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC) support your AB 2580 in concept, but would like to work with you on the language, as discussed more fully below. This bill would provide a streamlined process for converting hotels and motels into permanent housing when a project includes a specified percentage of units affordable to lower-income households.

Counties around the state are currently working hand-in-hand with homeless service providers, health officials, hotel and motel owners, and the State of California to house Californians who have been exposed to the coronavirus, or who are at an elevated-risk of becoming seriously ill, in hotel and motel rooms around the state. When California turns the corner on the COVID-19 crisis and begins the difficult recovery phase, we expect that these properties and others may be well-positioned to transition to permanent housing. Indeed, prior to the current public health crisis, counties were working with affordable housing developers to create affordable and supportive housing in former motel properties, or to legalize motel properties already serving as permanent housing within their zoning codes.

Building off of this ongoing work at the local level, our organizations would like to work with you on the specific details and language in AB 2580 to ensure that appropriate projects are fast-tracked without unintended consequences. Some of the particular areas of concern are:

- 1) Extend the deadline for review of applications for compliance with objective planning standards in Section 65913.6(b)(1) to at least 60 days.
- 2) Extend the deadline for design review to within 90 days of submittal if the development contains 150 or fewer units, or within 180 days of submittal if the development contains more than 150 units.
- 3) Add specific language to Section 65913.6 allowing local governments to impose standards for open space on-site for use of residents.
- 4) Clarify that an owner-occupied project otherwise subject to streamlined review pursuant to Section 65913.6(a)(3)(B) still must comply with the Subdivision Map Act.
- 5) Clarify that the project must be in *active* use as a hotel or motel at the time of conversion, to avoid the impacts associated with converting long-vacant structures permitted as hotels or motels in the distant past.

- 6) Allow some flexibility to condition or deny conversions due to specific adverse impacts (similar to other housing production statutes), or otherwise provide tools to address conversions on sites presenting unique concerns (e.g., where the conversion might create or exacerbate environmental justice concerns for future low-income residents).
- 7) Clarify the interaction between “reasonable objective design standards” in 65913.6(c)(1) and the listed grounds for denial in 65913.6(a)-(b), to avoid challenge to the enforceability of reasonable objective development standards.
- 8) Clarify that 65913.6(g)(1) does not preclude the local government from applying minimum square footage and related requirements set forth in the California Building Standards Code.

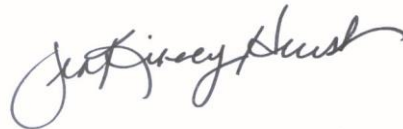
Finally, our organizations previously supported legislation that provided a CEQA exemption for motel conversion projects when the units will be used for transition and supportive housing. We continue to believe that many hotel and motel properties will present excellent opportunities for conversion to affordable and supportive housing and encourage you to consider increasing the proportion of affordable units required in order to access the streamlining provided in this bill.

We look forward to working with you on the amendments proposed above. Should you have any questions about our position, please do not hesitate to contact Christopher Lee (CSAC) at clee@counties.org, Jean Kinney Hurst (UCC) at jkh@hbeadvocacy.com, or Tracy Rhine (RCRC) at trhine@rcrcnet.org.

Sincerely,



Christopher Lee
California State Association of Counties



Jean Kinney Hurst
Urban Counties of California



Tracy Rhine
Rural County Representatives of California

cc: The Honorable David Chiu, Chair, Assembly Housing and Community Development Committee
Members, Assembly Housing and Community Development Committee
Lisa Engel, Chief Consultant, Assembly Housing and Community Development Committee
William Weber, Consultant, Assembly Republican Caucus